

July 14, 2006

Mr. Leroy Eadie
Current Planning Manager
Planning Services Department
City of Spokane
808 W. Spokane Falls Blvd.
Spokane, WA 99201-3329

RE: Kendall Yards Proposed Planned Unit Development (Z2006-06-PP/PUD)

Dear Mr. Eadie.

My name is Patrick Malone and I reside at 1301 N. Hollis in Spokane's historic West Central neighborhood. I and my family have been residents, business and property owners in West Central since May 1994. Residing for 11 of those years on the 1800 block of West Bridge immediately adjacent to the Kendall Yards site (or across from parcels #8 and #9 under the Summit PUD).

Arriving shortly after the approved Summit PUD (#Z9400048PP/PUD) we embraced its vision and immediately joined with neighbors in working toward larger neighborhood planning efforts, specifically the West Broadway Corridor and Maxwell/Maple Employment Center, to insure an integrated and comprehensive approach to the broader revitalization of the entire neighborhood. We supported Metropolitan Mortgage's original vision of a mixed-use and particularly mixed-income neighborhood featuring 1,032 mixed housing units (with a 10 percent low income set-aside) and their proposed commercial, office and neighborhood retail uses.

The underlying development framework for the PUD, which Black Rock Development obtained at site purchase, contained 14 separate development parcels, each with unique and specific design and development goals. Their detailed descriptions provided a clear and easily measurable build-out scenario. Later conversations with representatives from Nitzi-Stagen identified market conditions which added more residential and reduced the commercial square footage, for which we understand an amended PUD had not been filed, reviewed or approved when the partnership between Metropolitan and Nitzi ended.

Under both scenarios presented by the Summit PUD we were told that the majority of the commercial activity would occur east of the Maple Street corridor, leaving neighborhood convenience retail and office at approximately 40,000 square feet to be located in parcels #8 and #9 located generally between Elm Street and Maple Street. The balance was envisioned to be approximately 2,077,812 square feet of office/institutional (parcels #10, 11, 12) and approximately 1,215,324 square feet of hotel/office usage (parcels #13, 14) between Maple and Monroe Streets. This resulting in a total of approximately 3,333,136 square feet of gross floor area in associated commercial uses, only 0.12 percent of which would be retail in nature and thereby adequately serving new residents.

Public announcements by the Kendall Yard developer and Riverfront Properties LLC representatives have repeatedly stated they propose numerous modifications to the approved Summit PUD, including: a reduction of lot/parcel size from the previous 14 to 19; an increase in residential density/units from 1,500 to 2,600; a reduction in commercial space from 2.0 to 1.0 million square feet; dispersed commercial activity throughout the project through a combination of 6 nodes west of Maple/Ash (with the bulk concentrated in a mixed use pattern of retail, services, and offices from Maple to Monroe); revised auto circulation with a new “Kendall Yards Boulevard” between Ohio and Bridge Avenues and the elimination of egress from the Maple Street Bridge; proposed signalization from the proposed Boulevard at Maple and Monroe Streets, and various realignments of Bridge Avenue between Monroe and Post Streets and the introduction of various retail uses encompassing the stretch of Bridge Avenue and the existing Veteran’s Park.

In concept I very much support the stated values of an “urban village” that promotes clustering, view/vista corridors, walkability, mixed land uses, local retail and neighborhood services, transit, variable bulk/density/height in structures, open space, pedestrian linkages and an integration to the existing neighborhood. This approach to traditional town design or so called “new urbanism” is welcomed.

My express concerns, from the information I’ve read in the March 7, 2006 Supplemental Draft Environmental Impact Statement and public statements and/or materials, are as follows:

1. I am concerned that the owner/developer truly desires to increase residential densities to be between 5,000 and 6,000 units in the future. ***Therefore I request that the Planning Department/Commission specifically cap the approved number of residential housing units at a precise figure giving the developer market discretion in terms of their placement and distribution.***
2. I am concerned that the project makes no mention of or provision for affordable, below market housing. The 10 percent set-aside in the previous PUD at least provided a statement of public policy support for this critical community need. ***Therefore I request the Planning Department/Commission and city consider this issue as a negotiating point.***
3. I am concerned that not only the loss of potential affordable housing directly from the project, but the associated gentrification by other investors, will dramatically alter and shift the economics and ethnic composition of West Central. To date I have heard no proactive strategy by any public or private entity or partnership proposing creative ways to maintain and preserve affordable housing. Mr. Chesrown frequently makes reference to a favorite, model project in Denver – the Curtis Park area I believe. What makes this project so vital is that at the heart of the project is an \$87 million redevelopment effort incorporating several Denver Housing Authority and city owned low-income housing units. This partnership included HUD (under HOPE VI), the Denver Housing Authority, the City of Denver and a variety of private partners. Each of these actions were specifically to fulfill the adopted housing goals of the City’s comprehensive plan. ***Therefore I request that the Planning Department/Commission require the City of Spokane to facilitate and fund a comprehensive feasibility study for the purposes of identifying specific off-site affordable and low-income housing options to stabilize the***

neighborhood and prevent gentrification (which would totally be in conflict with the stated goals and purposes of the Comprehensive Plan).

4. I am concerned that automobile trip generation rates will exceed and perhaps even far exceed projections. The ultimate type and mix of both residential and commercial uses can drastically alter these projections. *Therefore I request that the Planning Department/Commission require mutually agreeable forms of public transportation, such as a fixed looped trolley service or modified STA routes, and that commercial non-office building footprints/site coverage be limited to 25,000 square feet per floor between Monroe and Maple and limited to 5,000 square feet per floor between Maple and Summit.*
5. I am concerned that proposed land use patterns and business activity might promote regional destination shopping, as opposed to neighborhood convenience retail as approved under the Summit PUD. *Therefore I request that the Planning Department/Commission place tight use and parking limitations so as to discourage or prohibit any type of use that is inconsistent with the character and intent of neighborhood convenience retail and/or office.*
6. I am concerned about the impact of new employees and their travel patterns if they are not local residents or if employers don't aggressively promote car-pooling or transit options, especially if total employment for the 1.0 million square feet of mixed commercial could generate between 2,000 and 5,000 new employees – at 200 and 500 square feet per employee respectively. *Therefore I request that the Planning Department/Commission require a combination of “first source hiring agreements” with the developer and future employers, along with various alternative transportation measures.*
7. I am concerned that while roads are recommended to be extended from existing West Central streets, that no provision for bike lanes are mentioned. *Therefore I request that the Planning Department/Commission require designated bike lanes along all street extensions and interior streets to the project.*
8. I am concerned that the proposed vacation of existing public right-of-way along Ohio, Summit, Ash, Elm and Cannon will result in not only the loss of public space, but also the creation of a huge “super-block” between Oak and Chestnut (a total of 12 parcels and probably 1,200 linear feet). *Therefore I request that the Planning Department/Commission propose some type of shared use agreement, like we do with utilities, so that public right-of-way can remain owned by the general public and further that no single “block” be larger than 600 feet and hopefully no more like 300 feet to promote walkability and accessibility.*
9. I am concerned that a project as large as 78 acres and involving as many residents (upwards of 5,000) and workers (upwards of 2,000) makes no significant provision for parks or truly public open space. *Therefore I request that the Planning Department/Commission place public use and access requirements on the proposed “nodes” and that new vista/view overlooks be mutually identified with City Parks along the Ohio/Summit corridor.*
10. Finally, I am concerned that the project does not coherently express an integrated approach to sustainable development. While it is the overall intent and purpose of our environmental policy acts to foster a holistic and cohesive orientation toward sustainability, it does not appear that the project achieves balance between economy,

ecology and equity. Strong indicators are obvious on the side of the economy, but less evidence appears on the overall benefits and enhancements of the neighborhoods ecological and social equity measures. ***Therefore I request that the Planning Department/Commission require that the applicant to state how they intend to promote and facilitate the ecological and social equity goals of the Neighborhood Design Plan and the City's Comprehensive Plan. If feasible I would ask that the examiner require the developer to provide the city within 120 days time a precise list of how "green building" practices, LEED principles and end-use material and resource utilization/recovery measures can and will be designed into all phases of construction. A host of practical and proven techniques to reduce such scarce ecological resources as water, for instance, are readily available in terms of internal water systems and landscape/irrigation systems. Grey water recharge/reuse, lighting and heating, passive and active solar design, recapturing drainage and rain water for public space watering, smart technology in terms of building usage are just a few of the many techniques the developer could and should incorporate to both protect this site and achieve adopted municipal policy.***

Sincerely,

Patrick Malone

cc: West Central Neighborhood Council
West Central Community Development Association
Spokane City Council
Spokane Planning Commission, Parks Board, Community Development Board and
Human Services Advisory Board